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Attorneys for Defendant Albert Houllou

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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CANON U.S.A. INC.,

Plaintiff,

-against-

F & E TRADING LLC, a New York Limited
Liability Company, D/B/A BIG VALUE, INC.,
ELECTRONICS VALLEY, ELECTRONICS BASKET,
DAVISMAL, NETSALES AND SIXTH AVENUE; F & E
TRADING LLC, a New Jersey Limited Liability
Company, D/B/A BIG VALUE, INC., ELECTRONICS
VALLEY, ELECTRONICS BASKET, DAVISMAL,
NETSALES AND SIXTH AVENUE, AND ALBERT
HOULLOU,

Defendants.
-----X

No. 15 Civ. 6015(DRH)(AYS)

Oral Argument Requested

**NOTICE OF DEFENDANT ALBERT HOULLOU'S
MOTION TO DISMISS THE AMENDED COMPLAINT**

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law dated January 19, 2016, and all prior papers and proceedings herein, Defendant Albert Houllou will move this Court before the Honorable Denis R. Hurley, United States District Judge for the Eastern District of New York, at the Courthouse, 100 Federal Plaza, Central Islip, NY 11722, for

an Order: (a) pursuant to Fed. R. Civ. P. 12(b)(6) dismissing the Amended Complaint with prejudice for failure to state a claim; and (b) for such other and further relief as this Court may deem just and proper. As per the Court's Order, Plaintiff shall serve (but not file) any opposition papers on or before February 15, 2016 (February 16, 2016 due to the holiday).

Dated: New York, New York
January 19, 2016

GOLDBERG & RIMBERG PLLC

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